

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

VANTAGE DRILLING COMPANY,

Plaintiff

v.

HSIN-CHI-SU A/K/A NOBU SU,

Defendant.

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CIVIL ACTION NO. 4:12-CV-03131

**SU'S DISCLOSURES IN ACCORDANCE WITH THE COURT'S
MARCH 11, 2013 MANAGEMENT ORDER**

In accordance with the Court's March 11, 2013 Order, Defendant Su provides the following 1) list of people with relevant information, including their names, cities (if known), companies, and a brief description of what they know; 2) term sheet showing the practical aspects of each transaction complained of; and 3) list of categories of relevant documents. The items identified in these disclosures are preliminary, and Su reserves the right to supplement or amend as the case develops.

1. People with Relevant Information

1. Corporate representative of Vantage Drilling Company
Plaintiff's allegations and actions regarding Su and his affiliated companies.
2. Paul Bragg, c/o Vantage Drilling Company
Houston, Texas
Statements and actions regarding Su and his affiliated companies.
3. Jorge Estrada, c/o Vantage Drilling Company
Statements and actions regarding Su and his affiliated companies.

4. Robert Grantham, c/o Vantage Drilling Company
Statements and actions regarding Su and his affiliated companies.
5. Duke Ligon, c/o Vantage Drilling Company
Statements and actions regarding Su and his affiliated companies.
6. Steinar Thomassen, c/o Vantage Drilling Company
Statements and actions regarding Su and his affiliated companies.
7. Ben Shaw, c/o Vantage Drilling Company
Statements and actions regarding Su and his affiliated companies.

2. Transactions

1. Every proposed issuance or offering by Vantage of ordinary shares on or after March 20, 2012
2. Vantage's failure to include F3 Capital and Nobu's director nominees in its proxy statement for the March 18, 2013 Extraordinary General Meeting of the company's shareholders.
3. Vantage's March 18, 2013 Extraordinary Meeting of Shareholders, including the calculation of votes.
4. The Transactions made the subject of plaintiff's lawsuit.

3. Categories of Documents

1. Documents relating to the allegations in Plaintiff's lawsuit
2. Documents relating to Su and F3 Capital's rights under Exhibit 10.3 of Vantage's March 20, 2012 8-K and every proposed issuance or offering by Vantage of ordinary shares on or after March 20, 2012
3. Documents relating to Su and F3 Capital's rights under the Voting Agreement and Irrevocable Proxy attached as Exhibit 10.2 to Vantage's March 20, 2012 8-K and every deliberation, conversation and decision relating to the Nominees.
4. Documents relating to issuance of 5,000,000 ordinary shares to Tomdrill Corp. and the relationship, if any, of Tomdrill Corp. to any insider or affiliate of Vantage Drilling.
5. Documents relating to Vantage's March 18, 2013 Extraordinary Meeting of Shareholders, including the calculation of votes.

6. Most current NOBO (Non Objecting Beneficial Owner) list from DTC and a copy of Vantage's current Transfer List
7. Documents relating to all shareholder inquiries and criticisms of management of Vantage

Respectfully Submitted,

By: /s/ Mark D. Manela

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CERTIFICATE OF SERVICE

I certify that on March 20, 2013, I electronically filed the foregoing Defendant's Motion for Leave to Conduct Expedited Discovery with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record who have consented to electronic notification, and further served the foregoing Motion upon the following counsel of record by facsimile:

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/s/ Jessica L. Crutcher
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